IN THE MATTER OF COUNTY BOARD OF APPEALS THE APPLICATION OF MARYLAND C. GORE FOR A SPECIAL HEARING AND SPECIAL EXCEPTION ON PROPERTY * BALTIMORE COUNTY LOCATED ON THE SW/CORNER OF CHESAPEAKE & BOSLEY AVENUES CASE NO. 90-329-SPHX (301 W. CHESAPEAKE AVENUE) 9TH ELECTION DISTRICT 4TH COUNCILMANIC DISTRICT

ORDER OF DISMISSAL

This matter comes to the Board as an appeal from an Order of the Zoning Commissioner dated April 16, 1990 dismissing without prejudice the Perition for Special Hearing and the Petition for Special Exception on the subject property located in the Ninth Election District of Baltimore County.

WHEREAS, the Board of Appeals is in receipt of a Letter of Dismissal filed September 12, 1990 (a copy of which is attached hereto and made 3 part hereof) from John C. Eidleman, Esquire, and Mary Helen McNeal, Esquire, Counsel for Appellants in the above-

WHEREAS, said Counsel requests that the appeal filed by them entitled case; and on behalf of the Appellants in this matter be dismissed and withdrawn as of September 12, 1990,

IT IS HEREBY ORDERED this 18th day of September, 1990 by the County Board of Appeals of Baltimore County that said appeal be and the same is hereby DISMISSED.

COUNTY BOARD OF APPEALS OF BALTIMORE COUNTY William T. Hackett, Chairman Harry E. Buchheister, Jr. Lynn B. Moreland LEGAL AID BUREAU, INCORPORATED BALTIMORE COUNTY OFFICE 29 WEST SUSQUEHANNA AVENUE

JAMES J. NOLAN, JR., PRESIDENT

SUITE 305 TOWSON, MARYLAND 21204-5201 (301) 296-6705

September 11, 1990

William T. Hackett, Chairman County Board of Appeals for Baltimore County County Office Building Room 315 111 W. Ch Sapeake Ave. Towson, Maryland 21204

Re: Petition for Special Exception and Special Hearing SW Corner of Chesapeake and Bosley Avenues Case No. 90-329-SPHX

Dear Chairman Hackett:

On behalf of Paul Jedlicka, Gary Sparks, Glenn Wilson, and other homeless male residents who formerly resided at 301 W. Chesapeake Ave., we hereby dismiss the Petition for Special Hearing and Special Exception that was filed concerning this property.

very truly yours, get C. Eiller John C. Eidleman may the hee hee. Mary Helen McNeal

cc: Peter Max Zimmerman, Esquire Robert E. Baker, Esquire

ST:6 HV 21 d35 06

Det.ris F. Rasmusser

BEFORE THE IN RE: PETITIONS FOR SPECIAL HEARING ZONING COMMISSIONER AND SPECIAL EXCEPTION SW cor. Chesapeake & Bosley Ave * * OF BALTIMORE COUNTY 301 W. Chesapeake Avenue 9th Election District 4th Councilmanic District * CASE #90-329-SPHY Maryland C. Gore Petitioner

ORDER OF DISMISSAL

The Petitioner herein requested a Petition for a Special Hearing for removal of the previous special exception for a nursing home and to determine that the proposed use would qualify as either a community care center, community building or group child care center (group adult care center); and a Petition for Special Exception for a Community Care Center or community building or group child care center (group adult care center).

WHEREAS, the Petitioner, Maryland C. Gore, failed to appear for the public hearing on March 2, 1990; and,

WHEREAS, various community associations and individuals appeared in

opposition to the relief requested; and, WHEREAS, representatives of the operation of the subject homeless shelter did appear and their interest in continuing the homeless shelter was presented Phyllis Friedman, Baltimore County People's Counsel; and, WHEREAS, every other individual, group and organization that claimed to have an interest in this homeless shelter was afforded an opportunity to be heard and present evidence; and,

WHEREAS, by agreement of counsel, this matter was continued from March

WHEREAS, by agreement of counsel, if no written request was received by the Zoning Commissioner on or before April 14, 1990, requesting that this matter be rescheduled for hearing, or that the matter be withdrawn, then the above captioned petitions were to be dismissed without prejudice after April 14, 1990; and,

WHEREAS, no such written request having been received on or before April 14, 1990,

IT IS THEREFORE ORDERED by the Zoning Commissioner for Baltimore County, this 16th day of April, 1990 that the Petition for Special Hearing and Petition for Special Exception in the above captioned matter be and the same is hereby DISMISSED without prejudice.

> ZONING COMMISSIONER OF BALTIMORE COUNTY

cc: Peoples Counsel

Baltimore County Zoning Commissioner Office of Planning & Zoning Towson, Maryland 21204 (301) 887-3353

May 16, 1990

Dennis F. Rasmus

Baltimore County Board of Appeals County Office Building, Room 315 Towson, Maryland 21204

RE: Petition for Special Hearing and Special Exception SW Corner Chesapeake and Bosley Avenue (301 W. Chesapeake Avenue) 9th Election District, 4th Councilmanic District MARYLAND C. GORE - Petitioner Case No. 90-329-SPHX

Please be advised that an appeal of the above-referenced case was filed in this office on April 16, 1990 by John C. Eidleman Attorneys for residents of the Baltimore County Men's Shelter. All materials relative to the case are being forwarded herewith.

Please notify all parties to the case of the date and time of the appeal hearing when it has been scheduled. If you have any questions concerning this matter, please do not hesitate to contact this office.

Zoning Commissioner

cc: Maryland C. Gore, Box 9692, Baldwin, MD 21013

Robert E. Baker, Esquire Suite 100, 21 W. Susquehanna Avenue, Towson, MD 21204

Linda Dorsey Walker 1 Investment Place, Suite 800, Towson, MD 21204

John C. Eidleman Mary Helen McNeal Legal Aid Bureau, Inc. 29 W. Susquehanna Avenue, Suite 305, Towson, MD 21204-5201

Rm. 304, County Office Bldg., Towson, Md. 21204

People's Counsel of Baltimore County

Baltimore County Zoning Commissioner Office of Planning & Zoning Towson, Maryland 21204 (301) 887-3353 J. Robert Haines

May 16, 1990

Baltimore County Board of Appeals Coun', Office Building, Room 315 Towson, Maryland 21204

RE: Petition for Special Hearing and Special Exception SW Corner Chesapeake and Bosley Avenue (301 W. Chesapeake Avenue) 9th Election District, 4th Councilmanic District MARYLAND C. GORE - Petitioner Case No. 90-329-SPHX

Please be advised that an appeal of the above-referenced case was filed in this office on April 16, 1990 by John C. Eidleman Attorneys for residents of the Baltimore County Men's Shelter. All materials relative to the case are being forwarded herewith.

Please notify all parties to the case of the date and time of the appeal hearing when it has been scheduled. If you have any questions concerning this matter, please do not hesitate to contact this office.

Zoning Commissioner

JRH:cer

Enclosures

cc: Maryland C. Gore, Box 9692, Baldwin, MD 21013

Robert E. Baker, Esquire Suite 100, 21 W. Susquehanna Avenue, Towson, MD 21204 Linda Dorsey Walker 1 Investment Place, Suite 800, Towson, MD 21204

John C. Eidleman Mary Helen McNeal Legal Aid Bureau, Inc. 29 W. Susquehanna Avenue, Suite 305, Towson, MD 21204-5201

People's Counsel of Baltimore County Rm. 304, County Office Bldg., Towson, Md. 21204

Petition for Special Hearing and Special Exception SW corner Chesapeake & Bosley Avenue (301 W. Chesapeake Avenue) 9th Election District - 4th Councilmanic District MARYLAND C. GORE - Petitioner Case No. 90-329-SPHX

Petition for Special Hearing and Special Exception

Description of Property Certificate of Posting

Certificate of Publication

Company of the Company

Entry of Appearance of People's Counsel

Legal Aid Bureau, Inc.

Zoning Plans Advisory Committee Comments

Director of Planning & Zoning Comments (None submitted)

Petitioner's Exhibits: 1; Plat to accompany Petition (Not marked) Protestant's Exhibits: 1) Letter of Opposition from Towson

Neighborhood Association

Zoning Commissioner's Order dated April 16, 1990 (Dismissed) Notice of Appeal received April 16, 1990 from John C. Eidleman and Mary

Helen McNeal, Attorneys on behalf of the homeless

cc: Maryland C. Gore, Box 9692, Baldwin, MD 21013

Robert E. Baker, Esquire Suite 100, 21 W. Susquehanna Avenue, Towson, MD 21204 Linda Dorsey Walker

29 W. Susquehanna Avenue, Suite 305, Towson, MD 21204-5201

1 Investment Place, Suite 800, Towson, MD 21204 John C. Eidleman Mary Helen McNeal

People's Counsel of Baltimore County Rm. 304, County Office Bldg., Towson, Md. 21204

Request Notification: P. David Fields, Director of Planning & Zoning Patrick Keller, Office of Planning & Zoning

J. Robert Haines, Zoning Commissioner Ann M. Nastarowicz, Deputy Zoning Commissioner James E. Dyer, Zoning Supervisor W. Carl Richards, Jr., Zoning Coordinator Docket Clerk Arnold Jablon, County Attorney

LEGAL AID BUREAU, INCORPORATED BALTIMORE COUNTY OFFICE 29 WEST SUSQUEHANNA AVENUE TOWSON, MARYLAND 21204-5201 (301) 296-6705

JAMES J. HOLAN, JR., PRESIDENT

April 16, 1990

Baltimore County Board of Appeals 111 W. Chesapeake Ave. Towson, Maryland 21204

Re: Appeal to Board of Appeals regarding 301 %. Chesapeake Ave.

Case No.90-329-SPHX #212

On behalf of clients of the Legal Aid Bureau, Inc., Paul Jedlicka, Gary Sparks, Glenn Wilson and other homeless male residents of the Baltimore County Men's Shelter located at residents of the Baltimore County Men's Shelter located of 301 W. Chesapeake Ave., we hereby note an appeal to the Board of Appeals from the decision of Zoning Commissioner Haynes dated April 16, 1990.

Enclosed is a check in the amount of \$100.00.

Very truly yours, John C. Eidleman

mary meten moneat
Attorneys for Paul Jedlicka, Gary Sparks, Glenn Wilson and
other homeless male residents of the Baltimore County Men's



Robert E. Baker, Esquie Suite 100, 21 W. Susquehanna Avenue Towson, Maryland 21204

RE: Petitions for Special Hearing and Special Exception Maryland C. Gore, Petitioner Case #90-329-SPHX

Attached hereto is Order of Dismissal regarding the above captioned matter.

Zoning Commissioner

cc: Peoples Counsel cc: Petitioner

BEFORE THE ZONING COMMISSIONER RE: PETITION FOR SPECIAL EXCEPTION : PETITION FOR SPECIAL HEARING OF BALTIMORE COUNTY SW Corner Chesapeake & Bosley Aves., 301 W. Chesapeake Ave. 9th Election District 4th Councilmanic District MARYLAND C. GORE, Petitioner

ENTRY OF APPEARANCE

::::::

Please enter the appearance of the People's Counsel in the abovecaptioned matter. Notices should be sent of any hearing dates or other proceedings in this matter and of the passage of any preliminary or final Order.

Phyllis Cole Friedman
People's Counsel for Baltimore County

Peter Max Zamen Peter Max Zimmerman Deputy People's Counsel Room 304, County Office Building Towson, Maryland 21204 887-2188

I HEREBY CERTIFY that on this 27th day of February, 1990, a copy of the foregoing Entry of Appearance was mailed to Robert E. Baker, Esquire, Suite 100, 21 W. Susquehanna Ave., Towson, MD 21204, Attorney for Petitioner.

212

PETITION FOR SPECIAL HEARING

TO THE ZONING COMMISSIONER OF BALTIMORE COUNTY: The undersigned, legal owner(s) of the property situate. Baltimore County and which is described in the description and plat attached hereto and made a part hereof, hereby petition for a Special Hearing under Section 500.7 of the Baltimore County Zoning Regulations, to determine whether or not the Zoning Commissioner and/or Deputy Zoning Commissioner should approve _____

Removal of the previous special exception for a nursing home and to determine that the proposed use would qualify as either a community care center, community building or group child care center (group adult care center)

Property is to be posted and advertised as prescribed by Zoning Regulations I, or we, agree to pay expenses of the above Special Hearing advertising, posting, etc., upon filing of this Petition, and further agree to and are to be bound by the zoning regulations and restrictions of Baltimore County adopted pursuant to the Zoning Law for Baltimore County.

I/We do solemnly declare and affirm, under the penalties of perjury, that I/we are the legal owner(s) of the property which is the subject of this Petition.

| ontract Purchaser: | Legal Owner(s): Maryland C. Gore (Type or Print Name) |
|--|---|
| (Type or Print Name) | Maryland C. Dore |
| Signature | Signature MAP NE IOA (Type or Print Name) |
| Address | 44 |
| City and State | Signature SATE 11 20 01 |
| Attorney for Petitioner: | 1: Box 9692 Phone No. 1000 |
| Robert E. Baker, Esq. (Type or Print Name) | J BALDWIMD 21013 TO DS |
| Signature | City and State |
| Suite 100, 21 W. Susquehanna-Ave | Name, address and phone number of the contacted tract purchaser or representative to be contacted LDIS CRAPUL SUNDAN HORSEY WALKER Name Name |
| Towson, MD 21204 City and State | Name L Tavestment Pl. Suite 825, Towson M. 887-4000 Phone No. |
| Attorney's Telephone No.:321-1748 | Address Phone No. |
| | · // day |

ORDERED By The Zoning Commissioner of Baltimore County, this _____ da_ of _____, 1920, that the subject matter of this petition be advertised, as required by the Zoning Law of Baltimore County, in two newspapers of general circulation throughout Baltimore County, that property be posted, and that the public hearing be had before the Zoning

Zoning Commissioner of Baltimore County

E.C.O.—No. 1

Baltimore County Zoning Commissioner

(301) 887-3353

J. Robert Haines
Zoning Commissioner

Office of Planning & Zoning

Towson, Maryland 21204

Maryland C. Gore Baldwin, Maryland 21013

Petitions for Special Exception and Special Hearing CASE NUMBER: 90-329-5PHX

SWC Chesapeake and Bosley Avenues 301 W. Chesapeake Avenue 9th Election District - 4th Councilmanic Petitioner(s): Mary!and C. Gore HEARING: FRIDAY, MARCH 2, 1990 at 9:30 a.m.

Dear Petitioners

Please be advised that \$188.25 is due for advertising and posting of the above captioned property.

THIS FEE MUST BE PAID AND THE ZONING SIGN & POST SET(S)

RETURNED ON THE DAY OF THE HEARING OR THE ORDER SHALL NOT ISSUE.

DO NOT REMOVE THE SIGN & POST SET(S) FROM THE PROPERTY

UNTIL THE DAY OF THE HEARING.

Please make your check payable to Baltimore County, Maryland. Bring the check and the sign & post set(s) to the Zoning Office, County Office Building. 111 W. Chesapeake Avenue, Room 113, Towson, Maryland fifteen (15) minutes before your hearing is scheduled to begin.

Be advised that should you fail to return the sign & post set(s), there will be an additional \$50.00 added to the above amount for each such set not returned.

> Very truly yours, ZONING COMMISSIONER

(If "PHASE II" of the "SNOW EMERGENCY PLAN" is in effect in Baltimore County on the above hearing date, the Hearing will be postponed. I the event of snow, tele-

Dennis F. Rasmusser

PETITION FOR SPECIAL EXCEPTION TO THE ZONING COMMISSIONER OF BALTIMORE COUNTY: 90-329-5PHY The undersigned, legal owner(s) of the property situate in Baltimore County and which is described in the description and plat attached hereto and made a part hereof, hereby petition for a Special Exception under the Zoning Law and Zoning Regulations of Baltimore County, to use the herein described property for _A Community Care Center or community building or____ group child care center (group adult care center)

Property is to be posted and advertised as prescribed by Zoning Regulations. I, or we, agree to pay expenses of above Special Exception advertising, posting, etc., upon filing of this petition, and further agree to and are to be bound by the zoning regulations and restrictions of Baltimore County adopted pursuant to the Zoning Law for Baltimore County.

I/We do solemnly declare and affirm, under the penalties of perjury, that I/we are the legal owner(s) of the property which is the subject of this Petition.

| | Legal Owner(s): |
|--|--|
| Contract Purchaser: | (Type or Print Name) |
| (Type or Print Name) | Mary land C. |
| Signature | (Type or Print Name) |
| Address | L |
| City and State | Signature |
| Attorney for Petitioner: | 1 SOX 9692 592-5715 Address Phone No. |
| Robert E Baker Esq(Type or Print Name) | BALDWIN MD 21013 |
| Signature | Name address and phone number of legal owner, con- |
| L Suite 100, 21 W. Susquehanna-Address | Linda Dosay Walker 12/24/09 |
| Towson, MD 21204City and State | Name 1 Investment A. Sutte 800 887 |
| Attorney's Telephone No.: 321-1748 | //)*** |
| ORDERED By The Zoning Commission | that the subject masses |
| of, 192, | County in two newspapers of general circulation through- |

Courty, on the _____ day of _____ day of _____ A. J. Robert String
Zoning Commissioner of Baltimore County

required by the Zoning Law of Baltimore County, in two newspapers of general circulation through-

out Baltimore County, that property be posted, and that the public hearing be had before the Zoning

Baltimore County Zoning Commissioner
Office of Planning & Zoning Towson, Maryland 21204 (301) 887-3353 J. Robert Haines Zoning Commissioner

December 26, 1989

Linda Dorsey Walker 1 Investment Place Suite 800 Towson, MD 21204

> RE: Petition for Special Hearing Petition for Special Exception 301 West Chesapeake Avenue 9th Election District

Dear Ms. Walker:

Please be advised that the above Petitions for Special Hearing and Special Exception, which were filed on December 21, 1989 have a new item number. The new item number is #212. The item number had to be changed due to an error in our numbering system.

When referring to your particular case, please use item #212. If you have any questions, please do not hesitate to call the office

> Very truly yours, Sophia C. Jennings
> Development Control

cc: Robert E. Baker, Esquira

ZONING DESCRIPTION

301 W. Chesapeake Avenue

9th Election District, Towson, Maryland

Beginning for the same at a point, said point being located on the west side of Bosley Avenue, 25 feet +/- from the center of Chesapeake Avenue, hence binding along the west side of Bosley Avenue; 1) by a curve w/ a radius of 1016.20 feet, L=156.35 feet, chord bearing S 06 41' 48" E 81.26 feet, hence leaving said curve on west side of Bosley Avenue; 2) N 06 29' 20" E 203.54 feet to the north side of Old Bosley Avenue; 3) by a curve w/ a radius of 95 feet, chord bearing S 55 37' 15" W 30 feet; 4) S 12 15' W 20.52 feet; 5) N 77 45' W 100 feet; 6) N 12 15' E 326 feet to the south side of Chesapeake Avenue, hence binding along the south side of Chesapeake Avenue; 7) S 77 45' E 100', and 8) S 83 30' 40" E 4.35 feet to the point of beginning.

Containing approximately 0.85 +/- acres (37,026 Square Feet) of land, more or less.

Baltimore County Zoning Commissioner Office of Planning & Zoning Towson, Maryland 21204 (301) 887-3353 J. Robert Haines Zoning Commissioner

NOTICE OF HEARING



Dennis F. Rasmussen County Executive

The Zoning Commissioner of Baltimore County, by authority of the Zoning Act and Regulations of Baltimore County will hold a public hearing on the property identified herein in Room 108 of the County Office Building, located at 111 W, Chesapeake Avenue in Towson, Maryland as

Petitions for Special Exception and Special Hearing CASE NUMBER: 9C-329-SPHX SWC Chesapeake and Bosley Avenues 301 W. Chesapeake Avenue 9th Election District - 4th Councilmanic Petitioner(s): Maryland C. Gore HEARING: FRIDAY, MARCH 2, 1990 at 9:30 a.m.

Special Exceptions For a community care center or community building or group child care center (group adult care center). Special Hearing: To approve the removal of the previous Special Exception for a nursing home and to determine that the proposed the would qualify as either a community care center, community building or group child care center (group and care center).

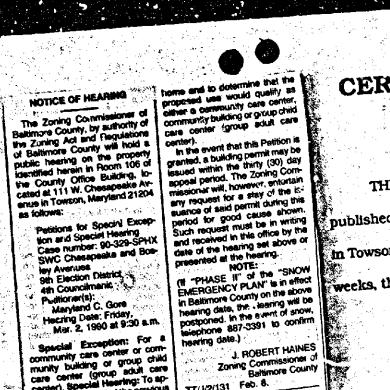
In the event that this Petition is granted, a building permit may be issued within the thirty (30) day appeal period. The Zoning Commissioner will, however, entertain any request for a stay of the issuence of said permit during this period for good cause shown. Such request must be in writing and received in this office by the date of the hearing set above or presented at the hearing,

NOTE:

(If "PHASE II" of the "SNOW EMERGENCY PLAN" is in effect in Baltimore County on the above hearing date, the Hearing will be postponed. In the event of snow, telephone 887-3391 to confirm hearing date.)

ZONING COMMISSIONER

Maryland C. Gore Linda Dorsey Walker Robert E. Baker, Esq.



CERTIFICATE OF PUBLICATION

TOWSON, MD. Johnsy 8 , 19 90 THIS IS TO CERTIFY, that the annexed advertisement was ublished in THE JEFFERSONIAN, a weekly newspaper published in Towson, Baltimore County, Md., once in each of ___ successive

5. Zele Olim.

County Board of Appeals of Baltimore County

COUNTY OFFICE BUILDING, ROOM 315 111 W. CHESAPEAKE AVENUE TOWSON, MARYLAND 21204 (301) 887-3180

August 24, 1990

Robert E. Baker, Esquire Suite 100 21 W. Susquehanna Avenue Towson, MD 21204

> RE: Case No. 90-329-SPHX Maryland C. Gore -Petitioner

Dear Mr. Baker:

The Board acknowledges receipt of your letter dated August 14, 1990, and a hearing has been scheduled before this Board on Wednesday, September 12, 1990, at 10:00 a.m., concerning the issues raised by you in your letter.

Your appearance is requested by this Board at the hearing, and, as a courtesy to you, no summons will be issued unless we hear from you to the contrary advising that a Board summons is necessary in order to have you appear on that date.

Very truly yours,

William T Hackett

William T. Hackett, Chairman County Board of Appeals for Baltimore County

cc: John C. Eidleman, Esquire Mary Helen McNeal, Esquire Phyllis Cole Friedman, Esquire

> SWC Chesapeake and Boeley Avenues.
> 9th Election District
> 4th Courcilmanic
> Petitioner(s):
> Maryland C. Gerg
> Hearing Date: #
>
> Mary 2, 1981.
>
> Mary 2, 1981.
>
> Special Exceptor or community building or group child care center (group adult care center). Special Hearing: To approve the removal of the previous Special Exception for a suraing home and to determine that the proposed use would quality as either a community care center, community building or group child care center (group adult care center). CERTIFICATE OF POSTING

> > Date of return: 2-16-90

ZONING DEPARTMENT OF BALTIMORE COUNTY 90-329-SPHX Date of Posting 2-9-96 Posted for: Accel Hearing & Special Exception

Petitioner: Maryland C. Yore Location of property SUf Corner of Cheospeake and Bosley arenne (301 W Cherepeake arenne) Un front of 301 W Chespeake avenue

CERTIFICATE OF POSTING

90-329-SPHX (301W Chospeake annue) Location of Se Class front of 30/W Chesafo cake avenue Date of return: May 25-90



County Board of Appeals of Baltimore County

COUNTY OFFICE BUILDING, ROOM 315 111 W. CHESAPEAKE AVENUE TOWSON, MARYLAND 21204 (301) 887-3180

September 18, 1990

John C. Eidleman, Esquire Mary Helen McNeal, Esquire Legal Aid Bureau, Inc. 29 W. Susquehanna Avenue, Suite 305 Towson, MD 21204-5201

Re: Case No. 90-329-SPHX Maryland C. Gore

Dear Counsel:

Enclosed please find a copy of the Order of Dismissal issued this date by the County Board of Appeals of Baltimore County in the subject matter.

sincerely, Sothern Kathleen C. Weidenhammer Administrative Assistant

Enclosure

cc: Robert E. Baker, Esquire Ms. Maryland C. Gore Ms. Linda Dorsey Walker
People's Counsel for Baltimore County P. David Fields Pat Keller J. Robert Haines Ann M. Nastarowicz James E. Dyer W. Carl Richards, Jr. Docket Clerk - Zoning Arnold Jablon, Count Attorney

HOTICE OF HEARING a follows: Petitions for Special Excep-

conter). With a secretary of experience in the event that this Polition is granted, a building permit may be issued within the thirty (30) day

issued within the thirty (30) day appeal period. The Zorning Commissioner will, however, entertain any request for a stay of the issuance of said permit during this period for good cause shown. Such request must be in writing and received in this office by the date of the hearing set auture or presents at the hearing.

NOTE:

(If "PHASE It" of the "SNOW EMETIGENCY PLAN" is in effect in Baltimore County on the above hearing date, the Hearing will be postponed. In the event of enow, telephone 887-3391 or confirm hearing date.)

J. ROBERT HAINE Zonkig Commissioner of Beltimore County (131 Feb. 8. CERTIFICATE OF PUBLICATION

TOWSON, MD., Jubusy 8, 1990 THIS IS TO CERTIFY, that the annexed advertisement was published in TOWSON TIMES, a weekly newspaper published in Towson, Baltimore County, Md., once in each of ____ successive weeks, the first publication appearing on Jeb 7, 19 90.

TOWSON TIMES,

RESOLVED: That the position of the West Towson Neighborhood Association of Baltimore County, Inc. as adopted by the Board of Directors on the zoning matter known as: 301 West Chesapeake Avenue, 90-329-SPHX #212 is that: Based on the West Towson Neighborhood Association, Inc. 1-1/2 years of experience in dealing with a "temporary" shelter for the homeless in our neighborhood, we strongly oppose the establishment of any temporary or permanent shelter for the homeless in the Towson area. This motion was passed by a unanimous vote.

AS WITNESS OUR HANDS AND SEAL THIS 1ST DAY OF MARCH 1990.

ATTEST: THE WEST TOWSON NEIGHBORHOOD ASSOCIATION OF BALTIMORE

Mary Laura Kalista Mary Laura Kalista

Frank Uebersax President

PROTESTANT'S EXHIBIT 1



Baltimore County. Maryland

PEOPLE'S COUNSEL **ROOM 304, COUNTY OFFICE BUILDING** 111 WEST CHESAPEAKE AVENUE TOWSON, MARYLAND 21204 887-**###**2188

PHYLLIS COLE FRIEDMAN People's Counsel

September 7, 1990

The Honorable William T. Hackett, Chairman County Board of Appeals Room 315, County Office Building 111 W. Chesapeake Avenue Towson, Maryland 21204

> RE: Maryland C. Gore, Petitioner Case No. 90-329-SPH

Dear Chairman Hackett:

It appears obvious that this zoning petition is no longer viable, based on all the circumstances surrounding the property and the desire of the owner.

Therefore, without waiving this office's right to participate at the hearing on September 12th, it is our present intent simply to submit on the record. This letter is written entirely without prejudice.

Very truly yours, Het Ma Commercia Peter Max Zimmerman Deputy People's Counsel

cc: Robert E. Baker, Esquire John C. Eidleman, Esquire Mary Helen McNeal, Esquire Thomas Farley, Esquire William J. Wiseman, III, Esquire

Zoning Commissoner

FUBLIC HEARING FEES 4188.25°

OF BALTIMORE COUNTY

SW Corner Chesapeake & Bosley Aves., 301 W. Chesapeake Ave. 9th Election District 4th Councilmanic District

Case No. 90-329-SPHX MARYLAND C. GORE, Petitioner

Please enter the appearance of the People's Counsel in the abovecaptioned matter. Notices should be sent of any hearing mates or other proceedings in this matter and of the passage of any preliminary or final Order.

Phyllis Cole Friedman
People's Counsel for Baltimore County

Peter Max Zamer-Peter Max Zimmerman Deputy People's Counsel
Room 304, County Office Building
Towson, Maryland 21204

I HEREBY CERTIFY that on this 27th day of February, 1990, a copy of the foregoing Entry of Appearance was mailed to Robert E. Baker, Esquire, Suite 100, 21 W. Susquehanna Ave., Towson, MD 21204, Attorney

for Petitioner.

County Board of Appeals of Baltimore County

COUNTY OFFICE BUILDING 111 W. CHESAPEAKE AVENUE TOWSON, MARYLAND 21204

HEARING ROOM - Room 301 County Office Building

(301) **EXECUTE** 887-3180 August 24, 1990

NOTICE OF ASSIGNMENT

NO POSTPONEMENTS WILL BE GRANTED WITHOUT GOOD AND SUFFICIENT REASONS. REQUESTS FOR POSTPONEMENTS MUST BE IN WRITING AND IN STRICT COMPLIANCE WITH BOARD RULE 2(b). NO POSTPONEMENTS WILL BE GRANTED WITHIN FIFTEEN (15) DAYS OF SCHEDULED HEARING DATE UNLESS IN FULL COMPLIANCE WITH RULE 2(c), COUNTY COUNCIL CASE NO. 90-322-SPH MARYLAND C. GORE -Petitioner

SW corner Chesapeake & Bosley Avenue (301 W. Chesapeake Ave.) 9th Election District

Docket Clerk - Zoning

Arnold Jablon, County Attorney

4th Councilmanic District SPH -Removal of previous SE for nursing home; determine that that proposed use qualifies for use as specified in Petition;

SE -Community Care Center 4/16/90 -Z.C.'s Order which DISMISSED Petition.

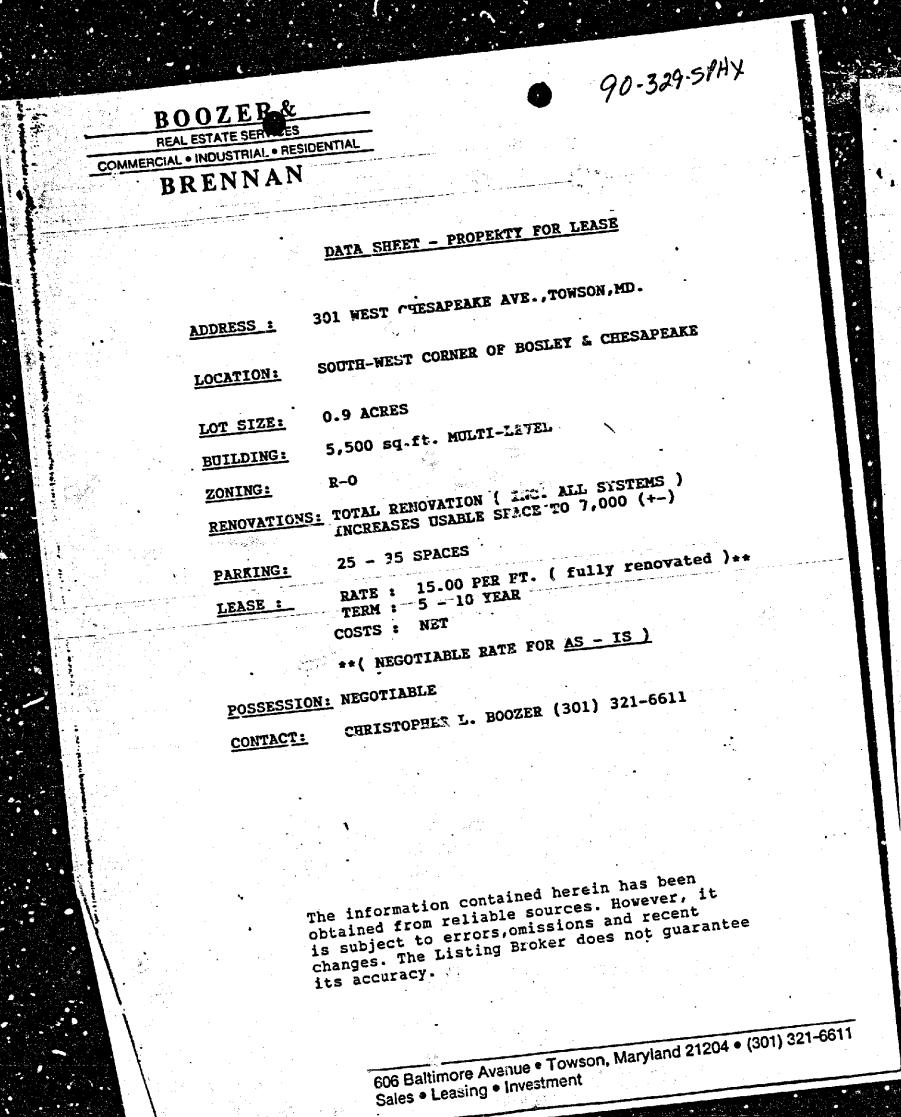
Hearing on preliminary issues of appropriateness of appeal, standing and Board's jurisdiction; this hearing is scheduled at Board's request, and has been

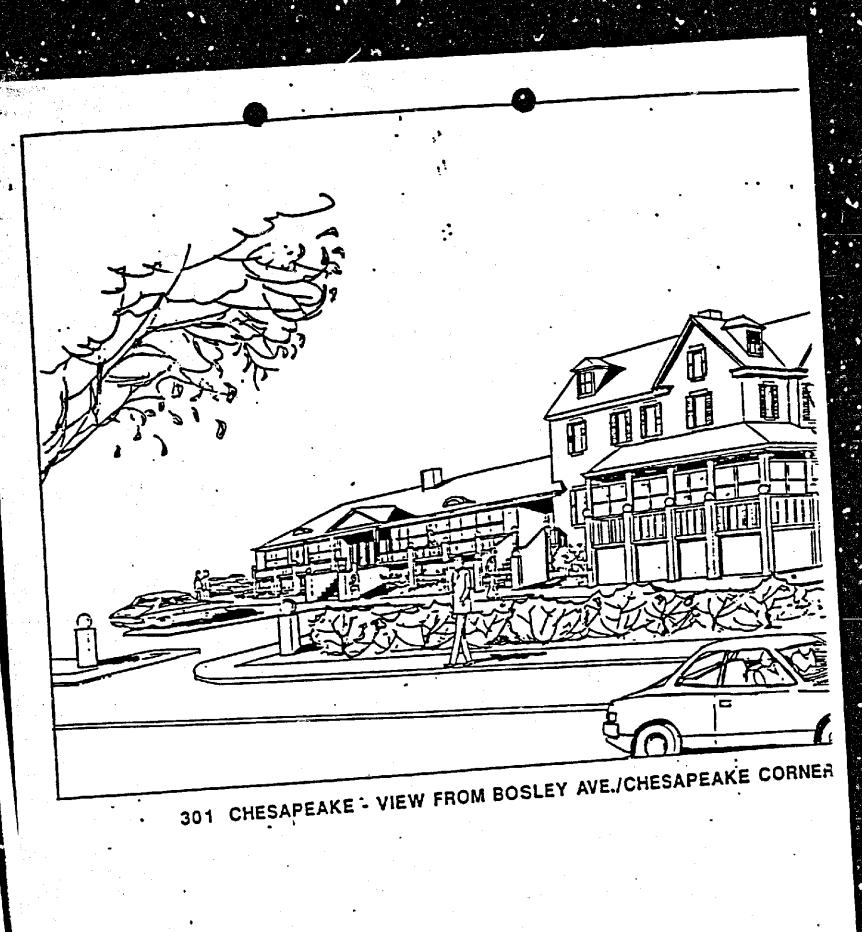
WEDNESDAY, SEPTEMBER 12, 1990 AT 10:00 a.m. ASSIGNED FOR:

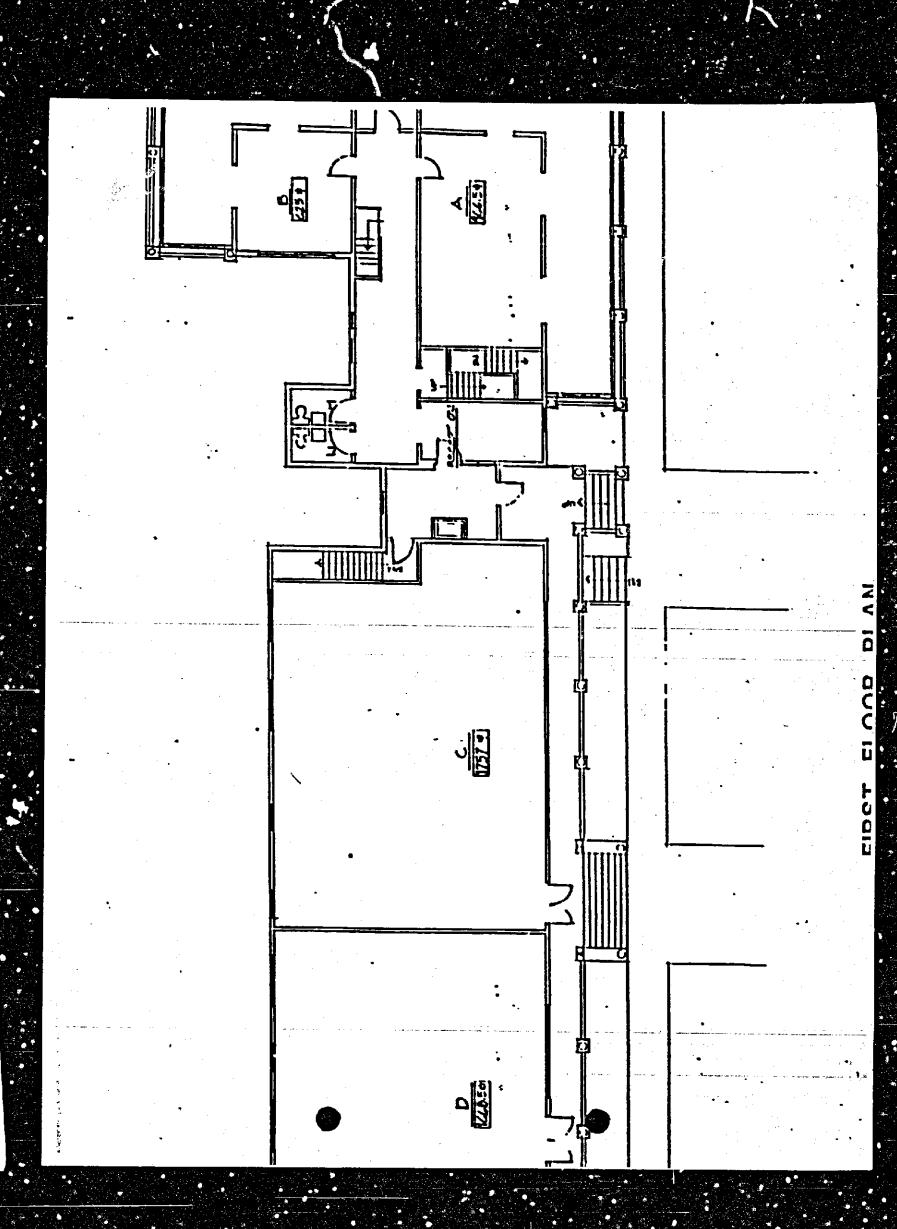
cc: Maryland C. Gore Petitioner Robert E. Baker, Esquire Coursel for Petitioner Linda Dorsey Walker John C. Eidleman, Esquire Legal Aid Dureau

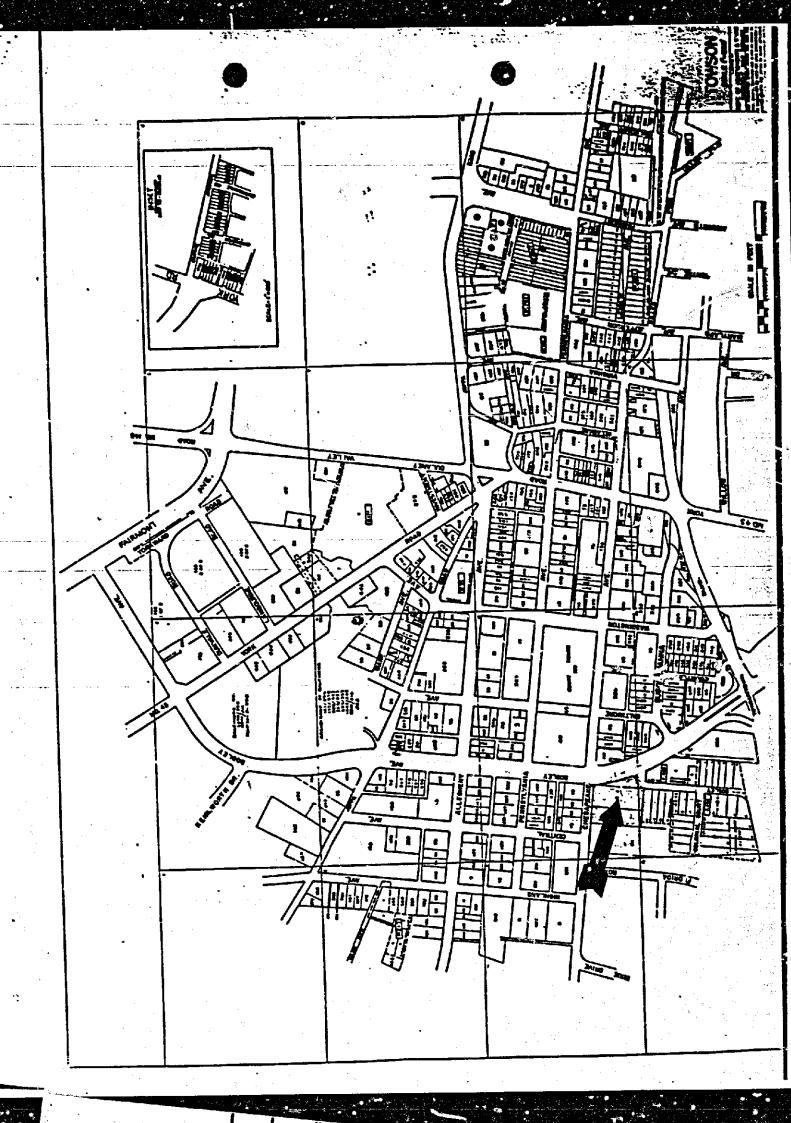
Mary Helen McNeal, Esquire Legal Aid Bureau People's Counsel for Baltimore County P. David Fields Pat Keller J. Robert Haines Ann M. Nastarowicz James E. Dyer W. Carl Richards, Jr.

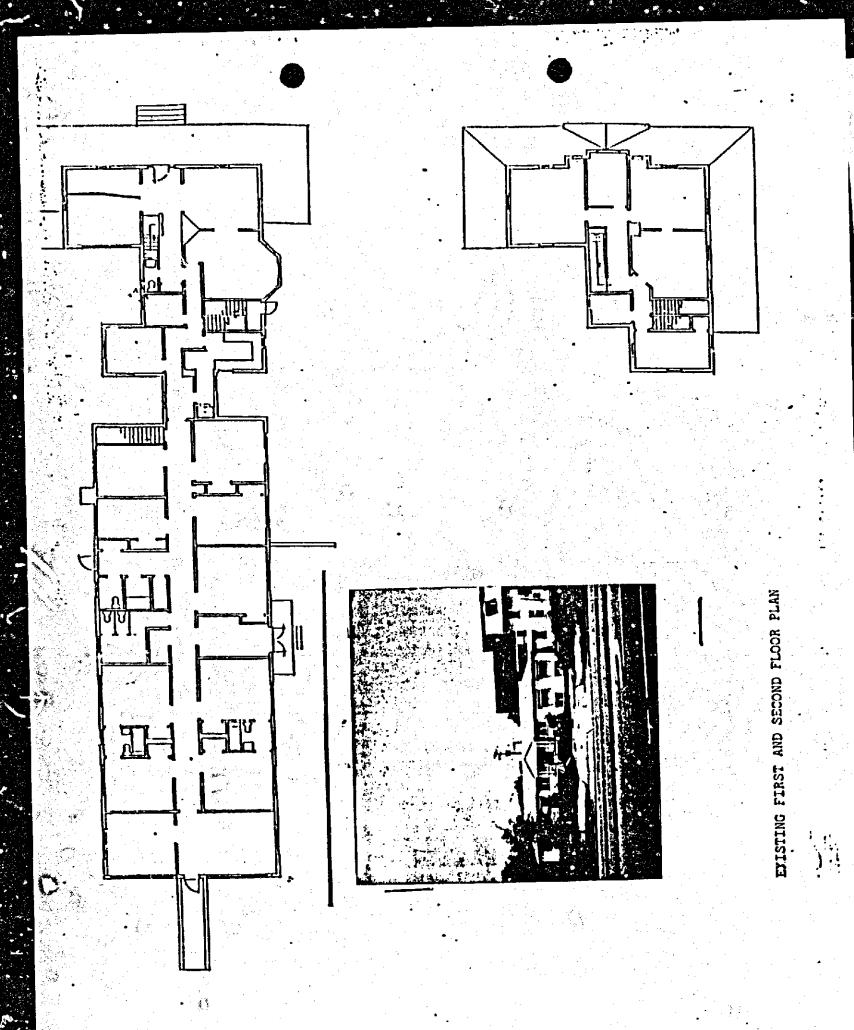
> Kathleen C. Weidenhammer Administrative Assistant











Baltimore County
Department of Community Development
One Investment Place, Suite 800
Towson, Maryland 21204
(301) 887-3317

Leslie M. Pittler Director

Room 109

December 7, 1989

ZONING UITICE

Towson, Maryland 21204

Mr. J. Robert Haines

Zoning Commissioner 111 W. Chesapeake Avenue

Homelessness of Baltimore County's citizens is a complex and growing issue Dear Commissioner Haines: which the County government is striving to address. The County's strong Homelessness of Baltimore County's citizens is a complex and your strong which the County government is striving to address. The County Executive commitment to assist its homeless citizens is expressed in County Executive Dennis F. Rasmussen's "Closest to the People" document wherein he states his intent to provide emergency shelter for the County's homeless. While his intent to provide emergency shelter facilities for homeless families, the County currently supports three shelter facilities for homeless there is no such shelter facility in the County specifically for homeless there is no such shelter facility in the County specifically for homeless there is no such shelter facility in the County specifically for homeless there is no such shelter which operated the establishment of a temporary emergency men's shelter which operated from January 20, 1989 to porary emergency men's shelter which operated from January 20, 1989 to porary emergency men's shelter which operated from January 20, 1989 to porary emergency men's shelter which operated from January 20, 1989 to porary emergency men's shelter which operated from January 20, 1989 to porary emergency men's shelter which operated from January 20, 1989 to porary emergency men's shelter which operated from January 20, 1989 to porary emergency men's shelter which operated from January 20, 1989 to porary emergency men's shelter which operated from January 20, 1989 to porary emergency men's shelter which operated from January 20, 1989 to porary emergency men's shelter which operated from January 20, 1989 to porary emergency men's shelter which operated from January 20, 1989 to porary emergency men's shelter which operated from January 20, 1989 to porary emergency men's shelter which operated from January 20, 1989 to porary emergency men's shelter which operated from January 20, 1989 to porary emergency men's shelter which operated from January 20, 1989 to porary emergency men's shelter men's experience which pen's emergency men's shelter which pen's experience men's a temporary emergency shelter.

The County identified and reviewed several sites as possible locations for the shelter, and has selected the site of the former Towson Convalescent the shelter, and has selected the site of the former Towson Containing this site. The County identified and reviewed several sites as possible locations to the shelter, and has selected the site of the former Towson Convalescent Center which is located at 301 W. Chesapeake Avenue. Certainly, this site would foster the success of the shelter program. It is located close to would foster the success which will provide the supportive operational services those County agencies which will provide the supportive operational services those County agencies which will provide the supportive operational services the shelter. The Office of Central Services will make all necessary for the shelter. The Services will maintain the heating, electrical, plumbing, modifications to the site to ensure it meets the shelter site requirements. The Central Services will maintain the heating, electrical, plumbing, further, Central Services will maintain the heating, electrical, plumbing, and air conditioning systems for the site. The Baltimore County Detention and air conditioning systems for the site. The Baltimore County agencies who would act center will provide laundry services throughout the period of shelter operation. The site is located close to various County agencies who would act it is referral sources for homeless men: the Department of Social Services; the Housing Office; and, the Police Department. The Housing office for case management, financial assistance, and Food Stamps; Social Services for case management, financial assistance, and Food Stamps; Social Services for case management, financial assistance, and Food Stamps; Social Services for case management, financial assistance, and Food Stamps; Social Services for case management, financial assistance, and Food Stamps; Social Services for case management, financial assistance, and Food Stamps; Social Services for case management, financial assistance, and Food Stamps; Social Services for case management, financial assistance, and Food Stamps; Social Services for case management, financial assistance, and Food Stamps; Social Services for case manage Mr. J. Robert Haines, Zoning Commissioner cont'd.

December 7, 1989

Recent conversation with your staff indicates this property at 301 W. Chesapeake Avenue, however, will probably require a special exception determination in order to be used as the proposed temporary emergency shelter for homeless men. I will appreciate your review of this situation. Baltimore County is dedicated to addressing the emergency needs of the bombless and as noted men. I will appreciate your review of this situation. Baltimore County is dedicated to addressing the emergency needs of the homeless, and, as noted above, this site would facilitate our efforts to help a segment of that homeless population, single men, for whom there is no other such assistance. With the extremes of winter weather approaching, we are hopeful to be able to make this temporary emergency shalter a reality by mid December.

Again, I appreciate your review of this situation. If you have any questions, please call me at 887-3317.

Director





Baltimore County
Office of Central Services
County Courts Building, Suite 412
Towson, Maryland 21204
(301) 887-2230

DEC 97 '89 15:21 \$

Timothy T. Harrison, Sr., CPA

December 7, 1989



Ms. Maryland C. Gore 11 Collingwood Road Phoenix, Maryland 21131

RE: 301 W. Chesapeake Avenue

Dear Ms. Goret

Please be advised that the Baltimore County Government, during the term of the Agreement of Lease (12/13/89 to 4/30/90) between you and Community Assistance Network, shall be responsible for the maintenance of the HVAC System in the southernmost or new portion of the improvements on the premises, and of the hot water heating system and window air conditioning units in the north or old portion of the improvements and for the sprinkler system throughout the improvements with respect to the maintenance and repair of the same during the term of this Least. Frovided, however, that in the event that the cost of repair to any one of the systems or units the che event that the cost of repair to any one of the wystems of unless shall exceed \$400, the excess over \$400 shall be paid by the Landlord unless the necessary repair shall have been occasioned by the negligence or want of care of the Tenant, its agents, servants, employees, clients, invitees or

should you have any questions or concerns regarding the above, please do not hesitate to contact me on 887-2232.

Sincerely,

F. Douglas Johnson Deputy Director for Facilities Management

FDJ16:dfh

po Leslie M. Pittler Kay F. Hunley J. Robert Haines Lois Cramer Boozer & Brennan Roody Counts

> Baltimore County Department of Public Works Bureau of Traffic Engineering Courts Building, Suite 405 Towson, Maryland 21204 (301) 887-3554

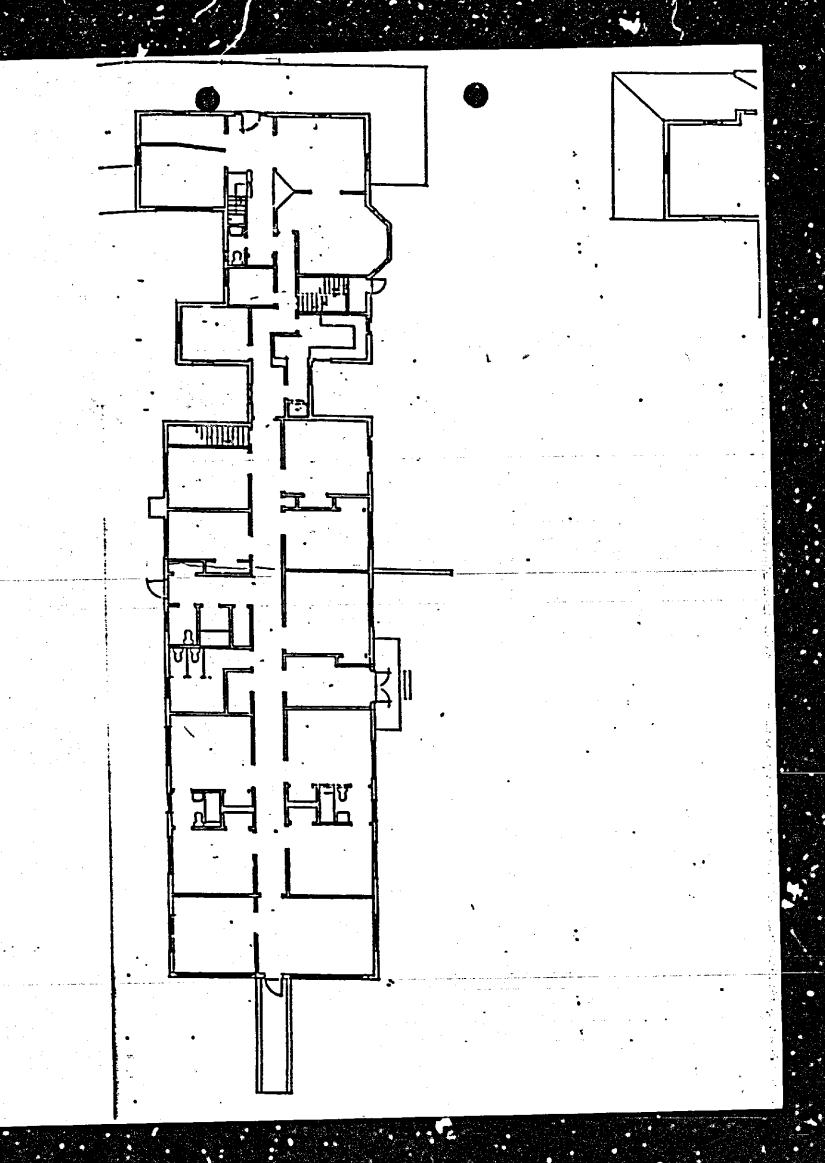
J. Robert Haines Zoning Commissioner County Office Building Towson, MD 21204

Dear Mr. Haines:

The Bureau of Traffic Engineering has no comments for items number 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 210 and 2123

Michael S. Flanigan, Traffic Engineer Assoc. II

ZONING OFFICE



BALTHORE COUNTY DEPARTMENT OF ENVIRONMENTAL ROTECTION AND RESOURCE MANAGEMENT

Zoning Commissioner Office of Planning and Zoning County Office Building Towson, Maryland 21204 Zoning Item # 2/2, Zoning Advisory Committee Meeting of January 9,1990

Property Owner: Maryland C. Gore Location: 301 West Chesapeake Ave. District: 9 _____ Sewage Disposal: COMMENTS ARE AS FOLLOWS:

(W) Prior to approval of a Building Termit for construction, renovation and/or installation of equipment for any existing or proposed food service facility, complete plans and specifications must be submitted to the Plans Review Section, Bureau of Regional Community Services, for final review and approval. () Prior to new installation(s) of fuel burning equipment, the owner shall contact the Bureau of Air Quality

Management, 887-3775, to obtain requirements for such installation(s) before work begins. () A permit to construct from the Bureau of Quality Management is required for such items as spray paint processes, underground gasoline storage tank(s) (5,000 gallons or more) and any other equipment or process which exhausts into the atmosphere.

() A permit to construct from the Bureau of Air Quality Management is required for any charbroiler generation which has a total cooking surface area of five (5) square feet or more.

Prior to approval of a Puilding Fermit Application for renovations to existing or construction of new health care facilities, complete plans and specifications of the building, food service area and type of equipment to be used for the food service operation must be submitted to the Plans Review and Approval Section, Division of Engineering and Maintenance, State Department of Health and Mental Hygiene for review and approval.

Prior to any new construction or substantial alteration of public swimming pool, wailing pool, bathhouse, saunas, whirlpools, hot tubs, water and severage facilities or other appurtenances pertaining to health and safety; two (2) copies of plans and specifications must be submitted to the Baltimore County Department of Environmental Protection and Resource Management for review and approval. For more complete information. contact the Water Quality Monitoring Section, Bureau of Regional Community Services, 687-6500 x 315.

(V) Prior to approval for a nursery school, owner or applicant must comply with all Baltimore County regulations For more complete information, contact the Division of Maternal and Child Health. () If lubrication work and oil changes are performed at this location, the method providing for the elimination of waste oil must be in accordance with the State Department of the Environment.

.. () Prior to razing of existing structure(s), petitioner must contact the Division of Waste Management at 887-3745, regarding removal and/or disposal of potentially hazardous materials and solid wastes. Petitioner must contact the Bureau of Air Quality Management regarding removal of asbestoes, 887-3775.

() Any abandoned underground storage tanks containing gasoline, waste oil, solvents, etc., must have the contents removed by a licensed hauler and tank removed from the property or properly backfilled. Prior to removal or abandonment, owner must contact the Division of Waste Management at 887-3745.

() Soil percolation tests, have been ____, must be ____, conducted.
() The results are valid until _____. () Soil percolation test results have expired. Petitioner should contact the Division of Water and Sewer to determine whether additional tests are required.

(). Where water wells are to be used as a source of water supply, a well meeting the minimum Baltimore County Standards must be drilled. () In accordance with Section 13-117 of the Baltimore County Code, the water well yield test

() shall be valid until () is not acceptable and must be retested. This must be accomplished prior to conveyance of property and approval of Building Permit Applications.

() Prior to occupancy approval, the potability of the water supply must be verified by collection of bacteriological and chemical water samples. () If submission of plans to the County Review Group is required, a Hydrogeological Study and an Environmental Effects Report must be submitted. For more information contact the Division of Environmental Management

() In order to subdivide this property, the owner or developer will be required to comply with the subdivision regulations of the State of Maryland and Baltimore County. If there are any questions regarding the

subdivision process, please contact the Land Development Section at 887-2762.

IREAU OF WATER QUALITY AND RESOURCE

MANACE-FINC

Baltimore County Zoning Commissioner Office of Planning & Zoning Towson, Maryland 21204 (301) 887-3353 J. Robert Haines Zoning Commissioner

February 2, 1990

Robert E. Baker, Esquire Suite 100, 21 W. Susquehanna Avenue Towson, MD 21204

Dennis F. Rasmussen
County Executive RE: Item No. 212, Case No. 90-329-SPHX Petitioner: Maryland C. Gore Petition for Special Hearing

The Zoni g Plans Advisory Committee has reviewed the plans submitted with the above referenced petition. The following comments are not intended to indicate the appropriateness of the zoning action requested, but to assure that all parties are made aware of plans or problems with regard to the development plans that may have a bearing on this case. Director of Planning may file a written report with the Zoning Commissioner with recommendations as to the suitability of the requested zoning.

Enclosed are all comments submitted from the members of the Committee at this time that offer or request information on your petition. If similar comments from the remaining members are received, I will forward them to you. Otherwise, any comment that is not informative will be placed in the hearing file. This petition was accepted for filing on the date of the enclosed filing certificate and a hearing scheduled accordingly.

IT WOULD BE APPRECIATED IF YOU WOULD RETURN YOUR WRITTEN COMMENTS TO MY OFFICE, ATTENTION JULIE WINIARSKI. IF YOU HAVE ANY QUESTIONS REGARDING THIS, PLEASE CONTACT HER AT 887-3391.

> Very truly yours, JAMES E. DYER Chairman Zoning Plans Advisory Committee

cc: Maryland C. Gore Baldwin, MD 21013

Baltimore County Zoning Commissioner
Office of Planning & Zoning Towson, Maryland 21204 (301) 887-3353 J. Robert Haines Zoning Commissioner



Your position has been received and accepted for filing this 10th day of January, 1989.

> 1. Robert frience ZONING COMMISSIONER

Petitioner: Maryland C. Gore Petitioner's Attorney: Robert E. Baker

Baltimore County Fire Department 700 East Joppa Road, Suite 901 Towson, Maryland 21204-5500 (301) 887-4500

Paul H. Reincke

JANUARY 11, 1990

J. Robert Haines Zoning Commissioner Office of Planning and Zoning Baltimore Courty Office Building Towson, MD 21204



RE: Property Owner: MARYLAND C. GORE Location: #301 WEST CHESAPEAKE AVENUE

Item No.: 212 Zoning Agenda: JANUARY 9, 1990 Gentlemen:

Pursuant to your request, the referenced property has been surveyed by this Bureau and the comments below are applicable and required to be corrected or incorporated into the final plans for the property.

5. The buildings and structures existing or proposed on the site shall comply with all applicable requirements of the National Fire Protection Association Standard No. 101 "Life Safety Code", 1988 edition prior to occupancy.

BALTIMORE COUNTY, MARYLAND
INTEROFFICE CORRESPONDENCE

TO: Zoning Advisory Committee DATE: January 19, 1990 FROM: Robert W. Bowling, P.E.

Zoning Advisory Committee Meeting for January 9, 1990

The Developers Engineering Division has reviewed the subject zoning items and we have no comments for Items 198, 199, 200, 201, 202, 204, 207, 208, 210 and

For Items 203, 205, and 206 the County Review Group Comments for each item still apply,

> ROBERT W. BOWLING, P.E., Chief Developers Engineering Division

RWB: 8

ROBERT E. BAKER --- ATTORNEY AT LAW ----SUITE 100 21 WEST SUSQUEHANNA AVENUE TOWSON, MARYLAND 21204

FIRST FLOOR

TELEPHONE (301) 321-1748

August 14, 1990

Baltimore County Enard of Appeals County Office Building, Room 315 Towson, Maryland 21204

Re: Petition for Special Hearing and Special Exception SW Corner Chr apeake and Bosley Avenue (301 W. Ches. yeake Avenue)
9th Election District, 4th Councilmanic District Maryland C. Gore - Petitioner Case No. 90-329-SPHX

Dear Board:

The undersigned is attorney for Maryland C. Gore, original The undersigned is attorney for Maryland C. Gore, original Petitioner before the Zoning Commissioner of Baltimore County in the above captioned case. By Order of the Zoning Commissioner, passed on April 16, 1990, the Petition in that case was DISMISSED without prejudice. This was in accord with the wishes of my client, as Petitioner.

It has come to my attention that an appeal has been filed from the Order of the Zoning Commissioner by attorneys of the Legal Aid Bureau, Inc., purporting to act on behalf of former residents of the property who are characterized as homeless persons. Please be advised that such persons, or their attorneys, have no authority to act on behalf of my client, either express or implied, and any such authority is specifically denied. Please be advised that at this time my client has no intention, present or future, to use the above captioned property as a shelter for homeless persons or for any like or similar use. Neither does my client have any desire any line of similar use. Reliner uses my client have any desire at this time that the special exception captioned above be granted, and, in fact, opposes the granting of the same.

It is my view, and I have so advised my client, that those persons who have appealed the Order of the Zoning Commissioner have no standing to do so.

> 30 VAIC 12 BN IS: 02 COUNTY BOARD OF APPEALS

LEGAL AID BUREAU, INCORPORATE BALTIMORE COUNTY OFFICE 29 WEST SUSQUEHANNA AVENUE SUITE 305 TOWSON, MARYLAND 21204-5201 (301) 295-6705

April 16, 1990

Baltimore County Board of Appeals 111 W. Chesapeake Ave. Towson, Maryland 21204

Re: Appeal to Board of Appeals regarding 301 W. Chesapeake Ave. Case No.90-329-SPHX #212

Dear Sir or Madam:

On behalf of clients of the Legal Aid Bureau, Inc., Paul Jedlicka, Gary Sparks, Glenn Wilson and other homeless male residents of the Baltimore County Men's Shelter located at 301 W. Chesapeake Ave., we hereby note an appeal to the Board of Appeals from the decision of Zoning Commissioner Haynes dated April 16, 1990.

Enclosed is a check in the amount of \$200.00.

Very truly yours,

John C. Eidleman

Mary Her Nicheas

Attorreys for Paul Jedlicka, Gary Sparks, Glenn Wilson and other homeless male residents of the Baltimore County Men's

Baltimore County Board of Appeals August 14, 1990

This letter is written because of the nature of the Appeal taken, and the persons by whom it was taken, in order to clarify the position of the original Petition in this case and for no other purpose. It is not intended to constitute the entry of an appearance by the Petitioner or by the undersigned on her behalf as to any further proceedings before the Board.

> Very Truly Yours, Robert E. Baker Attorney for Maryland C. Gore

DEC 07 '89 15:21 \$

cc: Mrs. Maryland C. Gore

Office of Central Services
County Courts Building, Suite 412 Towson, Maryland 21204 (301) 887-2230

Timothy T. Harrison, Sr., CPA

Ms. Maryland C. Gore 11 Collingwood Road Phoenix, Maryland 21131

RE: 301 W. Chesapeake Avenue

Please be advised that the Baltimore County Government, during the term of the Agreement of Lease (12/13/89 to 4/30/90) between you and Community Assistance Network, shall be responsible for the maintenance of the HVAC System in the southernmost or new portion of the improvements on the premises, and of the hot water heating system and window air conditioning units in the north or old portion of the improvements and for the sprinkler system throughout the improvements with respect to the maintenance and repair of the same during the term of this Lease. Provided, however, that in the event that the cost of repair to any one of the systems or units shall exceed \$400, the excess over \$400 shall be paid by the Landlord unless the necessary repair shall have been occasioned by the negligence or want of care of the Tenant, its agents, servants, employees, clients, invitees or residents.

Should you have any questions or concerns regarding the above, please do not hesitate to contact me on 887-2232.

December 7, 1989

Sincerely.

F. Douglas Johnson Deputy Director for Facilities Management

FDJ16:dfh

pc Leslie M. Pittler Kay F. Hunley J. Robert Haines Lois Cramer Boozer & Brunnan Woody Counts

Mr. J. Robert Haines Zoning Commissioner 111 W. Chesapeake Avenue Room 109 Towson, MD 21204

ZONING OFFICE

Re: 301 W. Chesapeake Avenue Petition for Special Exception

Dear Mr. Haines:

Enclosed find Petition and letters of opposition to any zoning changes or variances with regard to the referenced property. We are the neighbors immediately next to the Men's Homeless Shelter and, therefore, experience the consequences of such a use of the property. Since the Shelter has been in operation we have experienced an increase in transient individuals walking through our neghborhood, an accumulation of trash and bottles, breaking and enterings, as well as panhandling. This is not the environment we selected for our families when we chose Towson for our home.

Certainly your office will agree that our neighborhood has felt the blunt of the Government's desire to place a disproportionate share of its various "institutions" in our immediate area.

Respectfully submitted.

PETITIONERS

cc: Ms. Sue Schenning
cc: Barbara Bachur, Esquire
Baltimore County Council
cc: Timothy Fagan, Administrative Officer,
Baltimore County

HAND DELIVERED

8/24/90 - Following parties notified of hearing set for September 12, 1990 at 10:00 a.m.:

> Maryland C. Gore Robert E. Baker, Esquire Linda Dorsey Walker John C. Eidleman, Esquire Mary Helen McNeal, Esquire People's Counsel for Baltimore County P. David Fields Pat Keller J. Robert Haines Ann M. Nastarowicz James E. Dyer W. Carl Richards, Jr. Docket Clerk - Zoning Arnold Jablon, County Attorney

Shelter zoning battle could become moot

The Citizens Assistance Network, By Larry Carson a private, non-profit anti-poverty A temporary shelter for homeless men operating in Towson has become the subject of a zoning dispute that will not be decided until by the that wil long after the shelter is to close next nues. The ultimate decision, however, manent shelter is to be built six blocks north of there, at Kenilworth

County for how such facilities are and Bosley avenues, behind the cur-Kay Hunley, director of the Citizens Assistance Network, said yes-" A hearing on the shelter, in a forterday that about 18 men stay at the mer nursing home at 301 W. Chesapeake Ave., may also become a forum for neighborhood complaints about the homeless men who use the shelter. The hearing is scheduled for

Robert Haines. Court of Appeals decision.

to get in the business of running a shelter because the county wouldn't

vears to find a permanent location mas Eve. men. In the interim, a temporary winter shelter was opened last year in a county-owned building in Towson.

Meanwhile, some neignbors of all but residential uses west of Hosting the shelter have complained they have not been kept informed, that homeless men are too evident in the homeless men are too evident in the

Temporary

shelter most nights, though the num-neighborhood, and that a new special ber swelled to 27 this past frigid exception could mean some new 9:30 a.m. tomorrow before zoning shelter is unclear because of a 1989

The chief complainer is Richard shelter is unclear because of a 1989 denies a request for a special excepnot immune from local zoning laws. the building used for the shelter. But county zoning codes don't pro-

iolation, even if a special zoning ex- closed during the day.

way to apply county zoning laws to
the shelter — without preventing it
the shelter — without preventing it Baltimore County has sought from opening since county officials from opening since county officials saw a need for it. It opened Christ-

FUN SYLWINIA

LOCATION MAP

SCALE: 1" = 2000'

-SITE

vould likely stretch beyond April 13, vide for a privately-run shelter for using the shelter come to his buildwhen the temporarily winter operapear to leave the Towson shelter in roam the area while the shelter i West Towson Neighborhood Associater in the neighborhood. Members have been disturbed to find homeless men knocking on doors, seeking di "From a humane point of view

David R. Cox, vice president o the Southland Hills Improvement Association, said his group opposes

Baltimore County Zoning Commissioner
Office of Planning & Zoning
Towson, Maryland 21204 (301) 887-3353 J. Robert Finines
Zoning Commissioner

Baltimore County Board of Appeals County Office Building, Room 315 Towson, Maryland 21204

Case No. 9J-329-SPHX

RE: Petition for Special Hearing and Special Exception SW Corner Chesapeake and Bosley Averge (301 W. Chesapeake Avenue) 9th Election District, 4th Councilmanic District MARYLAND C. GORE - Petitioner

Please be advised that an appeal of the above-referenced case was filed in this office on April 16, 1990 by John C. Eidleman Attorreys for residents of the Baltimore County Men's Shelter. All materials relative to the case are being forwarded herewith.

Please notify all parties to the case of the date and time of the appeal hearing when it has been scheduled. If you have any questions concerning this matter, please do not hesitate to contact this office.

Zoning Commissioner

JRH:cer Enclosures

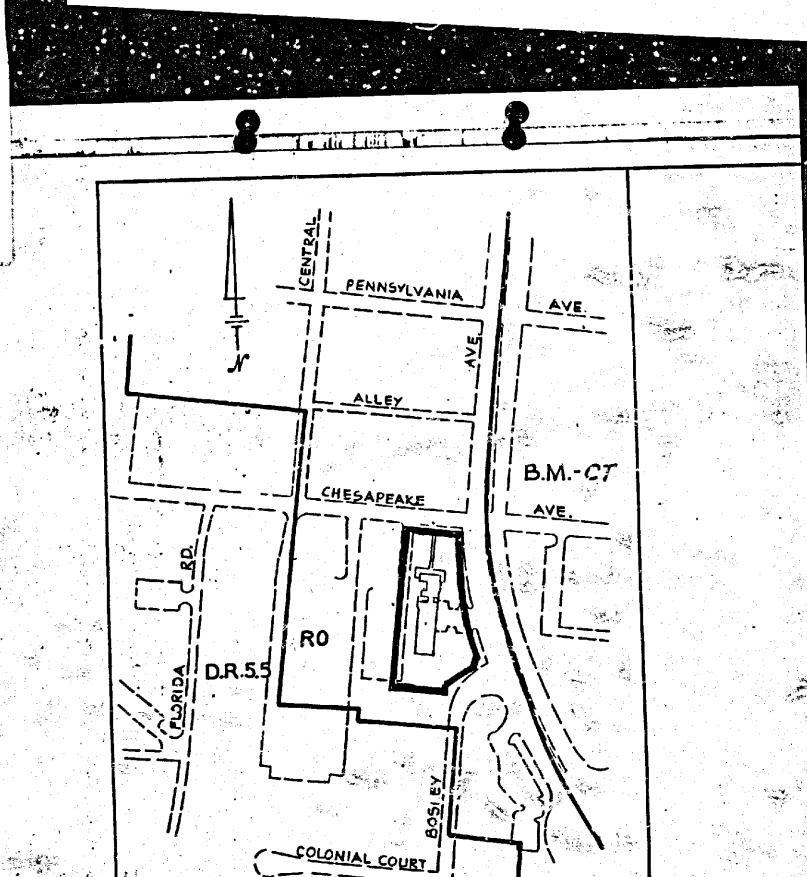
Sc: Maryland C. Gore, Box 9692, Baldwin, MD 21013 Robert E. Baker, Esquire

Suite 100, 21 W. Susquehanna Avenue, Towson, MD 21204 Linda Dorsey Walker

1 Investment Place, Suite 800, Towson, MD 21204 John C. Eidleman Mary Helen McNeal

Legal Aid Bureau, Inc. 29 W. Susquehanna Avenue, Suite 305, Towson, MD 21204-5201

People's Counsel of Baltimore County Rm. 304, County Office Bldg., Towson, Md. 21204



VICINITY

SCALE: 1" = 200" NE-10A

GENERAL NOTES:

COURTHOUSE

I.AREA OF PROPERTY 2.EXISTING ZONING OF PROPERTY

3.EXISTING USE OF PROPERTY

PETITION

WE, THE UNDERSIGNED, residents of the community adjacent to the Shelter for the Homeless hereby raise our objection and opposition to any zoning changes or variances which would encompass the use of that area for the purposes described in the Petition for Special Exception. (Copy of Petition attached hereto.)

220 Bosly Qre. 21204 220 Basten ans. 21204 220 BOSCET AUG 7/204 220 Basky Cine. 21204 Apo Boller One #21204 218 Bosley AUE 21204 218 Bosly av 21204 Hungelmen 210 Bosley are

Baltimore County Zoning Commissioner
Mr. J. Robert Haines
Baltimore County Office Building
111 W. Chesapeake Avenue Towson, MD 21204

Re: Zoning Variance - Home for the Homeless Dear Commissioner Haines:

Please be advised that I have been made aware of a Petition for Variance for property located on Bosley and Chesapeake Avenues which is adjacent to my neighborhood. I, the undersigned, would strongly object to any variance.

Very truly yours.

PETITION FOR SPECIAL HEARING TO THE ZONING COMMISSIONER OF BALTIMORE COUNTY:

The undersigned, legal owner(s) of the properly situate in Baltimore County and which is described in the description and plat attached hereto and made a part hereof, hereby petition for a Special Hearing under Section 500.7 of the Baltimore County Zoning Regulations, to determine whether or not the Zoning Commissioner and/or Deputy Zoning Commissioner should approve

that the proposed use would qualify as either a community care center, community building or group child care center (group adult care center)

Property is to be posted and advertised as prescribed by Zoning Regulations. I, or we, agree to pay expenses of the above Special Hearing advertising, posting, etc., upon filing of this Petition, and further agree to and are to be bound by the zoning regulations and restrictions of Baltimore County adopted pursuant to the Zoning Law for Baltimore County.

I/We do solemnly declare and affirm, under the penalties of perjury, that I/we are the legal owner(s) of the properly which is the subject of this Petition.

Legal Owner(s): Contract Purchaser: Maryland C. Gore Maryland C. Hore

Attorney for Petitioner: tract purchaser or representative to be contacted

Sinda Doney Walter 12/89 1 Investment Ply Sixte 800 87-6055

ORDERED By The Zoning Commissioner of Baltimore County, this _____ day ____, 19____, that the subject matter of this petition be advertised, as required by the Zoming Law of Baltimore County, in two newspapers of general circulation throughout Baltimore County, that property be posted, and that the public hearing be had before the Zoning Commissioner of Baltimore County in Room 106, County Office Building in Towson, Baltimore

MANATO LEGITA OF RESIDENCE -1/2016 (+1076)

ANY LAYER LYS RESIDENCE (17 HERMAN)

LYBE-/SEE 1-7/10- - LEEM SEE HERMEN TOLE PAR LLOR DOTE 12/21/89

Baltimore County Zoning Commissioner Mr. J. Robert Haines

Re: Zoning Variance - Home for the Homeless

Please be advised that I have been made aware of a Petition for Variance for property located on Bosley and Chesapeake Avenues which is adjacent to my neighborhood. I, the undersigned, would strongly object to any variance.

Baltimore County Office Building

Room 109

Towson, MD 21204

Dear Commissioner Haines:

Baltimore County Zoning Commissioner Mr. J. Robert Haines Baltimore County Office Building 111 W. Chesapeake Avenue Room 109 Towson, MD 21204

Re: Zoning Variance - Home for the Homeless

Dear Commissioner Haines:

Please be advised that I have been made aware of a Petition for Variance for property located on Bosley and Chesapeake Avenues which is adjacent to my neighborhood. I, the undersigned, would strongly object to any variance.

Very truly yours,

Baltimore County Zoning Commissioner Mr. J. Robert Haines Baltimore County Office Building
111 W. Chesapeake Avenue Room 109 Towson, MD 21204

Re: Zoning Variance - Home for the Homeless

Dear Commissioner Haines:

Please be advised that I have been made aware of a Petition for Variance for property located on Bosley and Chesapeake Avenues which i: adjacent to my neighborhood. I, the undersigned, would strongly object to any variance.

Very truly yours.

Baltimore County Zoning Commissioner Mr. J. Robert Haines Baltimore County Office Building 111 W. Chesapeake Avenue Room 109 Towson, MD 21204

Re: Zoning Variance - Home for the Homeless

Dear Commissioner Haines:

Please be advised that I have been made aware of a Petition for Variance for property located on Bosley and Chesapeake Avenues which is adjacent to my neighborhood. I, the undersigned, would strongly object to any variance.

Baltimore County Zoning Commissioner Mr. J. Robert Haines Baltimore County Office Building 111 W. Chesapeake Avenue Room 109 Towson, MD 21204

Re: Zoning Variance - Home for the Homeless

Dear Commissioner Haines:

Please be advised that I have been made aware of a Petition for Variance for property located on Bosley and Chesapeake Avenues which is adjacent to my neighborhood. I, the undersigned, would strongly object to any variance.

Baltimore County Zoning Commissioner
Mr. J. Robert lines
Baltimore Couply Office Building
111 W. Chesapeake Avenue
Room 109
Towson, MD 21204

Re: Zoning Variance - Home for the Homeless

Dear Commissioner Haines:

Please be advised that I have been made aware of a Petition for Variance for property located on Bosley and Chesapeake Avenues which is adjacent to my neighborhood. I, the undersigned, would strongly object to any variance.

Very truly yours,

Coller Blone

Mr. J. Robert Haines
Baltimore County Office Building
111 W. Chesapeake Avenue
Room 109
Towson, MD 21204

Re: Zoning Variance - Home for the Homeless

Dear Commissioner Haines:

Please be advised that I have been made aware of a Petition for Variance for property located on Bosley and Chesapeake Avenues which is adjacent to my neighborhood. I, the undersigned, would strongly object to any variance.

Vory truly Yours.

Grabelle Spicerh.

Baltimore County Zoning Commissioner Mr. J. Robert Haines Baltimore County Office Building 111 W. Chesapeake Avenue Room 109 Towson, MD 21204

Re: Zoning Variance - Home for the Homeless

Dear Commissioner Haines:

Please be advised that I have been made aware of a Petition for Variance for property located on Bosley and Chesapeake Avenues which is adjacent to my neighborhood. I, the undersigned, would strongly object to any variance.

Very truly yours,

Orlene Witchered

Baltimore County
Department of Community Development
One Investment Place, Suite 800
Towson, Maryland 21204
(301) 887-3317

Leslie M. Pittler

December 7, 1989

Mr. J. Robert Haines Zoning Commissioner 111 W. Chesapeake Avenue Room 109 Towson, Maryland 21204

Dear Commissioner Haines:

Homelessness of Baltimore County's citizens is a complex and growing issue which the County government is striving to address. The County's strong commitment to assist its homeless citizens is expressed in County Executive Dennis F. Rasmussen's "Closest to the People" document wherein he states his intent to provide emergency shelter for the County's homeless. While the County currently supports three shelter facilities for homeless families, there is no such shelter facility in the County specifically for homeless there is no such shelter facility in the County specifically for homeless men. Last year the County funded and directed the establishment of a temporary emergency men's shelter which operated from January 20, 1989 to porary emergency men's shelter which operated from January 20, 1989 to porary emergency men's shelter which operated from January 20, 1989 to and the opportunity for linkage to supportive services. To again this year address the needs of its homeless men during the upcoming period of extreme weather, Baltimore County has initiated a project to establish and operate a temporary emergency shelter.

The County identified and reviewed several sites as possible locations for the shelter, and has selected the site of the former Towson Convalescent Center which is located at 301 W. Chesapeake Avenue. Certainly, this site would foster the success of the shelter program. It is located close to those County agencies which will provide the supportive operational services for the shelter. The Office of Central Services will make all necessary modifications to the site to ensure it meets the shelter site requirements. Further, Central Services will maintain the heating, electrical, plumbing, and air conditioning systems for the site. The Baltimore County Detention Center will provide laundry services throughout the period of shelter operation. The site is located close to various County agencies who would act as referral sources for homeless men: the Department of Social Services; the Health Department; the Housing Office; and, the Police Department. Finally, the site is located near Baltimore County government's essential services which would support this homeless population: the Department of Social Services for case management, financial assistance, and Food Stamps; the Housing Office for affordable housing resources; the Office of Employment and Training for job training resources; and, the Department of Health. Funded by Baltimore County, the shelter would be managed and operated by Citizens Assistance Network (CAN).

Mr. J. Robert Haines, Zoning Commissioner cont'd.

December 7, 1989

Recent conversation with your staff indicates this property at 301 W. Chesapeake Avenue, however, will probably require a special exception determination in order to be used as the proposed temporary emergency shelter for homeless men. I will appreciate your review of this situation. Baltimore County is dedicated to addressing the emergency needs of the homeless, and, as noted above, this site would facilitate our efforts to help a segment of that homeless population, single men, for whom there is no other such assistance. With the extremes of winter weather approaching, we are hopeful to be able to make this temporary emergency shelter a reality by mid December.

Again, I appreciate your review of this situation. If you have any questions, please call me at 887-3317.

Je Myst

Director

Sincerely,

IMP:wlw

